

**AFFIDAVIT**

**FILED**

CASE NO. 3:17-MJ-2002

*Clerk of Supreme Court  
Eastern District of Tennessee  
At Knoxville*

I, K. Todd Gilreath, being duly sworn, state the following information to be true to the best of my knowledge, information and belief:

1. I am a Task Force Officer with the Federal Bureau of Investigation (FBI) and have been so assigned for approximately nineteen years. I am currently assigned to the Knoxville Field Office of the FBI and am assigned to the FBI Safe Streets Task Force (SSTF). I am a sworn police officer for the City of Knoxville, Tennessee, and have been so employed since January 1993. I am currently an Investigator with Knoxville Police Department's (KPD) Organized Crime Unit and have served in this capacity for approximately twenty-one years. During my tenure as a FBI Task Force Officer and KPD Police Officer and Investigator, I have investigated numerous crimes including, but not limited to, Hobbs Act robberies and weapons violations.

2. Except as noted, all of the information contained in this affidavit is either known to me personally or has been told to me by other law enforcement officials.

**PLACE TO BE SEARCHED**

3. This affidavit is being offered in support of a Search Warrant to search the body (via buccal swab) of Pierre Lamar JORDAN, who is a black male, with a date of birth of January 19, 1984, and a Social Security Number of 326-74-7077, for evidence of a Hobbs Act Robbery in violation of Title 18, United States Code, Section 1951.

**INVESTIGATION**

4. On November 22, 2016, at approximately 5:21 p.m., Cellular Sales, located at 4501 Chapman Highway, Knoxville, Tennessee, business telephone number (865) 291-2355, was robbed

by four black males brandishing pistols. Initially, two of the suspects entered the store and engaged a salesperson in a discussion about purchasing a cellular telephone. While the sales person was diverted, two additional suspects entered the store and displayed guns.

5. While inside, the four robbers donned blue latex gloves and directed three employees and one customer to the back of the store into a "safe room." Once inside the safe room, the robbers restrained each victim with "zip-ties." Additionally, the robbers forced a store employee to show them where the store video surveillance system was maintained. Upon discovering its location, the robbers unsuccessfully attempted to destroy the surveillance system. Video surveillance was later recovered by KPD and affirmed the eyewitness accounts of the robbery and descriptions of the robbers.

6. Following their attempts to destroy the surveillance system, the robbers grabbed multiple new cellular telephones, valued at approximately \$150,000 in United States currency, placed them in a black garbage bag and fled the store. 3SI Security was directly notified by the victim store and a representative from the security company notified Knox County E-911 that the store had been robbed and they were conducting a "live track" of a "bait phone" which was taken by the robbers during the robbery. The security company, in coordination with E-911, directed KPD officers to the location of the robbers' getaway vehicle by tracking the stolen bait phone. Upon locating the getaway vehicle, uniformed KPD officers attempted to initiate a traffic stop which resulted in a vehicle pursuit.

7. The getaway vehicle was identified as a silver Buick Enclave rented by PIERRE JORDAN from Enterprise Rent-A-Car in Rockford, Illinois. During its attempt to evade law enforcement, the getaway vehicle crashed into another vehicle at Rowan Road and Cedar Lane in Knoxville, Tennessee. The robbers exited the vehicle and fled on foot from the accident scene. Shortly thereafter, three of the robbers were taken into custody by KPD officers.

8. The cellular telephones stolen from the victim business were located in the getaway vehicle, along with two 9 mm pistols (one of which was reported stolen from Rockford, Illinois), zip-ties, blue latex gloves and other clothing items observed to be worn by the robbers in the surveillance video.

9. At the time of the robbery, Cellular Sales, the victim business, was actively engaged in interstate commerce. General Counsel for Cellular Sales, Reese K. Thomas, advised cellular telephones purchased for retail sale by the victim business were bought from multiple locations, to include Baltimore, Maryland and Branchburg, New Jersey.

10. The arrested robbers were identified as follows:

A) SIR TYRONE LOVE, a black male, last known address 3204 Darwood Drive, Rockford, Illinois 61101; Love has been charged by the State of Tennessee with one count of Aggravated Robbery, four counts of Aggravated Kidnapping, and one count of evading arrest.

B) DEANGELO LEMONT DOSS, a black male, last known address 917 Tenth Avenue, Rockford, Illinois 61104; Doss has been charged by the State of Tennessee with one count of Aggravated Robbery, four counts of Aggravated Kidnapping, and one count of resisting arrest.

C) PIERRE LAMAR JORDAN, a black male, last known address 2406 Auburn Street, Rockford, Illinois 61103. Jordan has been charged by the State of Tennessee with one count of Aggravated Robbery and four counts of Aggravated Kidnapping.

11. The Federal Bureau of Investigation (FBI) Laboratory will conduct analysis of the DNA on the evidence items once known samples have been obtained from Pierre Lamar JORDAN.

## CONCLUSION

12. Based upon the foregoing information, there is probable cause to believe that on the person of Pierre Lamar JORDAN there is currently DNA suitable for comparison to the DNA swabs taken from the above-referenced items. The DNA sought by this search warrant represents evidence of a crime against the United States of America, that is, evidence of the Hobbs Act Robbery of Cellular Sales, located at 4501 Chapman Highway, Knoxville, Tennessee that occurred on November 22, 2016, in violation of Title 18, United States Code, Section 1951.

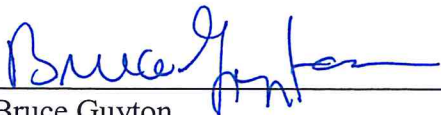
FURTHER AFFIANT SAYETH NAUGHT.

Executed this 9 day of January, 2017, at Knoxville, Tennessee.



K. Todd Gilreath  
Task Force Officer  
Federal Bureau of Investigation

Subscribed and sworn to me  
On this 9 day of January, 2017.



H. Bruce Guyton  
UNITED STATES MAGISTRATE JUDGE